

IN THE UNITED STATES DISTRICT COURT
FOR
THE THIRD CIRCUIT

RECEIVED

SEP 13 2017

UNITED STATES OF AMERICA

*

Chambers of
Anne E. Thompson, U.S.D.J.

v.

*

Civil No.:
Criminal No.: 3:12-cr-204-01

C. TATE GEORGE

*

RECEIVED

Petitioner

SEP 13 2017

* * *

PETITIONER'S REQUEST FOR LEAVE TO AMEND
MOTION TO VACATE, SET ASIDE OR CORRECT CONVICTION
AND SENTENCE PURSUANT TO 28 U.S.C. SECTION 2255 WITH AFFIDAVIT

AT 8:30
WILLIAM T. WALSH
CLERK M

NOW COMES the Petitioner C. Tate George, pro se, and requests this Honorable Court for leave to amend his pending motion pursuant to 28 U.S.C. Section 2255, and states as follows:

1. That the following proposed amendment is submitted to the court to correct certain discrepancies in the pending Section 2255 petition. This amendment is presented in the form of an affidavit duly signed by Petitioner.

2. That during my trial in 2013, the government subpoenaed documents it later claimed not to have copies thereof right before Petitioner testified on his own behalf. My former attorney Mr. Schafer informed me of several boxes he had received from the government prior to trial. Petitioner recently received copies of his trial transcripts and discovered that on September 23, 2013 (during trial proceedings) that these boxes of discovery were actually received by his former attorney John Kaley's office,

and not the government as indicated in Petitioner's Section 2255 motion.

3. That in the transcript dated September 23, 2013, Mr. Schafer states that he had just received six to seven boxes from John Kaley's office that he had not reviewed prior to trial.

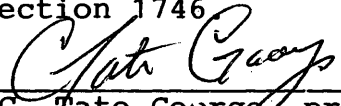
4. That attached hereto is a copy of the subpoena delivered to Petitioner during trial requesting documents which he had no access to prior to trial. In his Rule 33 filing and hearing, Petitioner laid out evidence that was "blocked" by the government on discs and emails by means of a subpoena on the AOL Online Service that would have exposed all government witnesses to perjury resulting in a jury verdict of not guilty.

5. Petitioner states in his Section 2255 petition that the signed release was in the boxes handed over during the trial. In truth, the said release was retrieved from the blocked discs provided me post-trial by the government through Mr. Schafer as well as a copy that was in the boxes handed over by attorney John Kaley right before trial. Remember, Mr. Schafer failed to review the contents of these boxes prior to trial.

WHEREFORE, the Petitioner C. Tate George, pro se, requests this Honorable Court for leave to amend his Section 2255 motion to include the foregoing clarification of facts.

AFFIDAVIT


I HEREBY CERTIFY that a copy of the foregoing "Request for Leave to amend the Section 2255 motion" is based upon facts that are true and correct to the best of my knowledge and belief under penalty of perjury as per 28 U.S.C. Section 1746


C. Tate George, pro se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Request for Leave to Amend was mailed on this 27th day of August, 2017, by first-class mail, postage prepaid to:

Bruce P. Keller, AUSA
Office of the U.S. Attorney
970 Broad Street
Rm. 700
Newark, NJ 07102



C. Tate George, pro se
Fed. No. 63223-050
FCI Fort Dix
Box 2000
Joint Base MDL, NJ
08640-5433

EXHIBIT "A"

(EXCERPTS FROM TRIAL TRANSCRIPT)

COLLOQUY

1 could highlight the paragraph from "accordingly" down to the
 2 signature of the judge or the clerk.

3 Judge, if I could read this one paragraph into the
 4 record.

5 THE COURT: Any objection?

6 MR. INTRATER: No, Your Honor.

7 THE COURT: Okay.

8 MR. SCHAFER: "Accordingly, we reverse the trial
 9 judge's January 5th, 2011, orders granting summary judgement
 10 to the city and granting summary judgement to Gemennessee in
 11 the foreclosure matter. We affirm the January 5th, 2011,
 12 order denying East Orange Housing Authority's motion for
 13 summary judgement and we reverse the December 21st, 2011,
 14 final judgment of the tax sale certificate foreclosure in
 15 favor of Gemennessee. We remand to the trial court for
 16 further proceedings consistent with this opinion. Affirmed in
 17 part; reversed in part; and remanded. We do not retain
 18 jurisdiction."

19 Your Honor, at this point --

20 THE COURT: Counsel, can I see you at the side,
 21 please?

22 (Whereupon the following occurred at side-bar:).

23 THE COURT: I really try not to cut you off in
 24 mid-sentence, but I just wanted to know what you were about to
 25 say.

COLLOQUY

1 MR. SCHAFER: Mr. George is going to testify.

2 MR. SHUMOFSKY: We can excuse the jury so the
 3 defendant can have an Advice of Rights before he testifies.
 4 The Government would ask for that.

5 THE COURT: Okay. A little recess.
 6 (End of side-bar.)
 7 We're going to have a short recess, members of the
 8 jury. We'll be back in 10 minutes.

9 (The jury leaves the courtroom.)

10 THE COURT: We should do that now, counsel.

11 The Government has requested that there be a colloquy
 12 on the record regarding defendant's right to testify and his
 13 corresponding right not to testify. We have been given no
 14 protocol for this type of a proceeding. Do you have a
 15 suggestion, Mr. Shumofsky?

16 MR. SHUMOFSKY: I would just like the defendant --
 17 the Government ask he be aware he has a right not to testify,
 18 that he will be testifying under oath, that he has no
 19 obligation to testify at this point in trial, any statements
 20 he makes that not only can be used against him in this trial,
 21 if they are turn out to be untrue and they are of a material
 22 nature could be subject to a subsequent perjury proceeding
 23 against him. I want to make sure he is aware of all those
 24 things before he takes the stand in this matter. And, of
 25 course, please emphasize -- thank you, Mr. Intrater -- to the

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 151 of 161 PageID: 2253

151

COLLOQUY

1 defendant that the Government's burden remains unchanged. The
 2 burden is on the Government, so he has no reason to testify,
 3 but if he does do that I want to make sure he is aware of his
 4 rights before he takes the stand.

5 THE COURT: Mr. Schafer or counsel?

6 MR. SCHAFER: Your Honor, I have made my client aware
 7 of that. I don't know whether this is related to this
 8 procedure here, but we received a subpoena on Friday night
 9 at -- I received it at approximately 5:24 p.m. I just
 10 happened to be in the office. And it was to Mr. George and/or
 11 The George Group, and it was, I guess, about a three-page
 12 subpoena for documents related to this particular trial. As
 13 far as I know, most of Mr. George's records are in my office
 14 scattered all over the office. I picked them up from his
 15 former attorney Mr. Kaley. Mr. George has been giving me a
 16 couple things here and there, but 99 percent of this stuff was
 17 from Mr. Kaley. It is about six or seven boxes.

18 The subpoena was due to be returned today. We did not
 19 have time to search through these boxes, and I assume that
 20 I'll have time after the trial is done to go through this and
 21 see if we have any of the information requested. But I just
 22 thought we should put that on the record.

23 THE COURT: Mr. Shumofsky?

24 MR. SHUMOFSKY: Your Honor, the defendant has known
 25 about this case since September of 2011 when he was arrested.

United States District Court
 Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 152 of 161 PageID: 2254

152

COLLOQUY

1 He was indicted in 2012. We didn't show up at the beginning
 2 of jury selection to tell the defendant we were prosecuting
 3 him. He has known this for a long time. The subject matter
 4 of the subpoena covers things the defendant should be aware
 5 of. There has been some evidence in this trial to suggest
 6 that the defendant has fabricated documents. The Government
 7 learned that the defendant would be taking the stand and
 8 served a subpoenaed to that ilk. The Government suggests if
 9 these documents are in Mr. Schafer's office we adjourn for the
 10 day right now, the defendant go back to Mr. Schafer's office,
 11 spend time before cross-examination or his testimony in this
 12 case considering what's at risk for the defendant, look over
 13 those things and find what's relevant.

14 THE COURT: He would not -- the defendant would not
 15 have to respond to a subpoena from the Government if he
 16 exercised his right not to testify because it would extend,
 17 also, to his right not to have to produce any documents.

18 MR. SHUMOFSKY: Yes, Your Honor, I will add that the
 19 Government also served a subpoena on The George Group L.L.C.
 20 and an entity that does not of a Fifth Amendment right, but,
 21 certainly, if the defendant does take the stand, and those
 22 documents are not available to him, and he is not available to
 23 respond to certain questions the Government may have, we want
 24 to make sure he has the opportunity to find those things, if
 25 necessary, if they're in Mr. Schafer's office.

United States District Court
 Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 153 of 161 PageID: 2255

153

COLLOQUY

1 THE COURT: Yes?

2 MR. INTRATER: I'm sorry, Your Honor. Just to add to
3 what Mr. Shumofsky said, the purpose of the subpoena,
4 obviously, is that to the extent on direct examination Tate
5 George makes certain claims, which claims would be supported
6 by the existence of documents supporting his version of
7 events, we want to make sure that there are no documents
8 supporting Mr. George's version of events. We're confident
9 that there are not, but just to put everybody on notice during
10 cross-examination we will ask him if these supposed oral
11 modifications of important documents were made, where are the
12 modified documents? Where are the amendments? Where are the
13 signed versions by the counter parties? That's what we're
14 looking for with the vast majority of what's requested by the
15 subpoena.

16 THE COURT: All right. Well, Mr. Schafer and Ms.
17 Bergman, if the table -- if the roles were reversed here and
18 you needed time to get ready for cross-examination, and you
19 needed to make sure that the witness was given a full
20 opportunity to get their documents reviewed before they would
21 have to be subject to cross-examination by you, I think you
22 would properly be requesting a brief recess, and I think that
23 the Government's request is appropriate.

24 MR. SCHAFER: Your Honor, with all due respect, I
25 don't want -- we have a jury here, and I can't in a couple

United States District Court
Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 154 of 161 PageID: 2256

154

COLLOQUY

1 hours come back and say that this information isn't here. I
2 mean, perhaps the Court should review the subpoena for itself
3 to look at what they're asking for. I think if they could
4 point to, number one, what documents that they believe are not
5 true that have already been submitted, perhaps we can limit
6 this whole search and tell them, look, we don't have anymore
7 documents of that ilk, but I don't want to have the jury
8 waiting and me to come back in whatever period of time is
9 elapsed and say, look, we don't have these documents.

10 THE COURT: Why don't you just turn the documents
11 over wholesale to the Government and when they have reviewed
12 them they can let you know that they're ready?

13 MR. SCHAFER: This is -- as I said, Your Honor, it is
14 like seven boxes of documents.

15 THE COURT: Somebody has got to review them.

16 MR. SHUMOFSKY: The one thing the Government agrees
17 with the defense on is the expeditious nature in which this
18 should be done. The one person who is most familiar with
19 those documents is the defendant. It seems that if he is
20 going to take the stand we should all be in a position to know
21 if the documents do exist, if the search has been made, and if
22 they don't exist that nothing has been found, and that's the
23 total amount of documents. I mean, right now we're talking
24 about six or seven boxes of documents in Mr. Schafer's office.
25 Are there -- I would like to know, are there 20 boxes of

United States District Court
Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 155 of 161 PageID: 2257

155

COLLOQUY

1 documents sitting in Howard Trachtenberg's office in Florida?
 2 If that's the case, then, obviously, adjourning it for three
 3 weeks would be something the Government could consider, but,
 4 obviously, is not as realistic. But we would like to know if
 5 that's something out there that defendant is going to rely on
 6 if he takes the stand and says, Well, I have it, it is in a
 7 safe deposit box down in Florida in Boca Raton or whatever the
 8 case may be, but the stuff, as you can imagine -- Your Honor,
 9 I'm happy to hand you a copy of the subpoena. It is very
 10 straightforward things.

11 THE COURT: It is business records, right?

12 MR. SHUMOFKY: Business records with respect to
 13 every single investor that has testified in this case. We ask
 14 for any amendment with respect to the execution of documents.

15 With respect to -- and I have a copy I'm handing Your
 16 Honor with respect to the certain e-mails that Your Honor saw
 17 during the testimony of some of the individuals, for example,
 18 Mr. Mellinger there was representations by the defendant that
 19 he was breaking a CD and that the money would be available or
 20 certificate of deposit and the money would be available for
 21 Mr. Mellinger. I wanted to know the CD, what's the date of
 22 it, are there any documents to support that representation?
 23 What efforts were made with the bank to cash in on that CD?
 24 All things of that nature when representations were made to
 25 certain defendants about money.

United States District Court
 Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 156 of 161 PageID: 2258

156

COLLOQUY

1 To the same ilk, there was representations of Brevin
 2 Knight in August and September of 2009. I have a check, I'm
 3 sending you the check, wherever you want to be in the world
 4 I'm sending it to you, it is there. A month went by. Brevin
 5 Knight said, I haven't gotten the check. I want to ask the
 6 defendant if there is, does that check ever exist? It would
 7 be very good evidence for him if he showed us the check saying
 8 here is the check, I wrote it out from this account, this is
 9 what happened. I don't know why Mr. Knight didn't get it.
 10 But we don't want to be sitting here in cross-examination and
 11 for the defendant to flop in our lap, you know, I decided to
 12 take the stand finally. I have known about this case for two
 13 years. This is my day in court. I wish somebody told me I
 14 could have got this stuff together. So we want to afford him
 15 that opportunity.

16 MR. SCHAFER: Your Honor, I would ask the Court if we
 17 could recess today, we'll send the jury home, and we will have
 18 an answer everything tomorrow morning either the documents or
 19 a no to the documents.

20 THE COURT: I think, Mr. Schafer, that would be a
 21 very sensible course of action.

22 MR. SCHAFER: Thank you, Your Honor.

23 THE COURT: Thank you. So I'll tell the jury to come
 24 back at 10. We'll convene here at nine. And we'll see where
 25 we go from there.

United States District Court
 Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 157 of 161 PageID: 2259

157

COLLOQUY

1 Let me see you at the side briefly on the record.
 2 (Whereupon the following occurred at side-bar:)
 3 THE COURT: I don't plan to bring the jury back in
 4 the room just to tell them that we're adjourned for the day.
 5 Miss Heffner is very experienced at telling jurors as the case
 6 goes on sometimes that there are some gaps. So that's fine.
 7 It is 3:00 now for the record. The reason I wanted to see you
 8 at the side is that this is a public proceeding, obviously,
 9 this trial is, but that we do have the sealed matter involving
 10 the records of Charles Houlihan that Mr. Houlihan evidently
 11 hasn't produced yet because he's not had a waiver of the
 12 attorney/client privilege provided to him by Mr. George. I
 13 can foresee that this is going to become problematical if
 14 that's his answer to everything. Mr. Houlihan keeps my bank
 15 records and my business records from that period of time. I
 16 don't know how to address it, but I can see it coming.
 17 MR. INTRATER: There's a limitation to it all. All
 18 we're looking for is -- all we're looking for by the subpoena
 19 is for records in Mr. George's possession of all of these
 20 modifications to the documents of all of the payments that he
 21 sent to his investors that were never received, all of the
 22 statements that Mr. George made in the e-mails and in letters
 23 that there's no backup for.
 24 MR. SHUMOFSKY: But I would add, Your Honor, to the
 25 extent that there's a file in Charles Houlihan's office that

United States District Court
 Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 158 of 161 PageID: 2260

158

COLLOQUY

1 has nothing to do with attorney/client privilege if there's a
 2 document in --
 3 THE COURT: A business record?
 4 MR. SHUMOFSKY: A business record of the George Group
 5 that demonstrates there's an amendment to a promissory note
 6 for any of the investors that is something if for some reason
 7 Charles Houlihan is hanging on to he should have to produce
 8 that to Mr. George in defense of this case.
 9 One moment, please.
 10 If for some reason Mr. Houlihan is arguing I'm not
 11 handing anything over until I'm paid that might work civilly,
 12 but considering Mr. George is under federal indictment the day
 13 has come for him to testify, if that is the case we ask that
 14 be brought to our attention so we can ask Your Honor to get
 15 involved to get a necessary order to hand over the records
 16 back to Mr. George, so they can be produced in court.
 17 THE COURT: I am adjourning the jury now, but we need
 18 to bring in by telephone as soon as possible without impeding
 19 the document review that defense counsel and defendant will be
 20 doing, we need to bring in counsel for Mr. Houlihan, and I
 21 will tell them that business records would never be privileged
 22 and those would have to be provided to Mr. George to use in
 23 his defense.
 24 MR. INTRATER: Exactly.
 25 THE COURT: If they exist. Okay? All right.

United States District Court
 Trenton, New Jersey

COLLOQUY

1 Anything else? Good. Okay.

2 (End of side-bar.)

3 THE COURT: I hereby declare a recess because of this
4 subpoena matter, and we will resume the trial in the morning
5 at 9:00 a.m. so that the defense side can have an opportunity
6 to respond to the subpoena. I'll instruct the courtroom
7 deputy to tell the jury to be here to start at 10.

8 MR. INTRATER: Thank you, Your Honor.

9 THE COURT: And then, counsel, you are required to
10 stay behind because we have to have a sealed proceeding after
11 the courtroom is clear.

12 MR. INTRATER: Yes, Your Honor.

13 (Brief Recess)

14 (Whereupon, an on the record sealed matter was conducted.)

15 THE COURT: Now we're back on the record in the
16 pending trial case, and I'll just take your appearances,
17 please.

18 MR. INTRATER: Zach Intrater for the United States.

19 MR. SCHAFER: Dave Schaffer for Tate George.

20 MS. BERGMAN: Andrea Bergman for Tate George.

21 THE COURT: Its 4:00 now, and we have had the
22 developments that the Government served a document subpoena on
23 the defendant, and the defense counsel will be reviewing those
24 documents for material that's responsive to the subpoena, and
25 it is a pretty large volume of documents, and defense counsel

United States District Court
Trenton, New Jersey

COLLOQUY

1 may need to do a little bit of extra investigation, as well.

2 And I would like to afford them that opportunity, but it can't

3 all be accomplished realistically by tomorrow morning, so I

4 hereby direct that the jury be instructed that they not come

5 to trial tomorrow and that we'll resume the trial Wednesday

6 morning. We'll take it day-by-day is all I can say. But I

7 would like if possible tomorrow for us to conduct the jury

8 instruction charge conference so that we'll have that already

9 taken care of and can move along smoothly with the jury

10 whenever we're able to reassemble with them. Is that

11 acceptable?

12 MS. BERGMAN: Yes.

13 MR. INTRATER: It is to the Government.

14 MR. SCHAFER: Your Honor, what time would you like us
15 for the charge conference?

16 THE COURT: Why don't you -- we can talk by phone in
17 the morning since we don't need to have the jury here in at
18 10, and I'm much more interested that you pursue this document
19 issue. We can get around to the charge conference any time
20 tomorrow at your convenience because, obviously, our day is
21 set aside for the trial. So talk to the courtroom deputy.

22 MR. SCHAFER: Thank you, Your Honor.

23 THE COURT: We'll do the conference in person, but
24 scheduling it tomorrow will be secondary to whatever you need
25 to do for further trial preparation.

United States District Court
Trenton, New Jersey

Case 3:12-cr-00204-MLC Document 77 Filed 09/30/13 Page 161 of 161 PageID: 2263

161

COLLOQUY

1 MR. INTRATER: Thank you, Your Honor.

2 THE COURT: Okay. Good.

3 (Proceedings concluded at 4:00 p.m.)

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United States District Court
Trenton, New Jersey

EXHIBIT "B"
(COPY OF SUBPOENA)



US v. George, 12-204 (MLC)

Shumofsky, Joseph (USANJ)

to:

Andrea_Bergman@fd.org, David_Schafer@fd.org

09/20/2013 05:24 PM

Cc:

"Intrater, Zach (USANJ)", "Shumofsky, Joseph (USANJ)"

Hide Details

From: "Shumofsky, Joseph (USANJ)" <Joseph.Shumofsky@usdoj.gov>

To: "Andrea_Bergman@fd.org" <Andrea_Bergman@fd.org>, "David_Schafer@fd.org" <David_Schafer@fd.org>,

Cc: "Intrater, Zach (USANJ)" <Zach.Intrater@usdoj.gov>, "Shumofsky, Joseph (USANJ)" <Joseph.Shumofsky@usdoj.gov>

During the Trial

1 Attachment



US v. George, 12-204 (MLC) - Subpoena.pdf

Andrea and David,

Attached plea find a subpoena directed to The George Group, LLC and/or the defendant.

Joseph

Joseph

Joseph B. Shumofsky

Assistant United States Attorney

United States Attorney's Office

District of New Jersey

970 Broad Street, 6th Floor

Newark, New Jersey 07102

Phone: 973-297-2098

Fax: 973-297-2045

Email: joseph.shumofsky@usdoj.gov



The George Group LLC and/or C. Tate George
c/o Office of the Federal Public Defender
22 South Clinton Avenue
Station Plaza No. 4, Fourth Floor
Trenton, New Jersey 08609
Attn.: Andrea Bergman, Esq. and David E. Schafer, Esq.

SUBPOENA ATTACHMENT

Please provide the following:

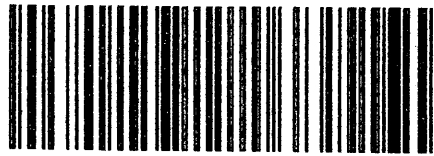
- A* 1. All records relating to written modifications to any contract, investment agreement, finance agreement, promissory note, escrow agreement, or guarantee made between The George Group, LLC, C. Tate George, Alexys Heights Development, LLC, Howard Trachtenberg or any other entity owned or controlled by C. Tate George and any of the following individuals
- a. Ralph Ramsey;
 - b. Dwayne Taylor;
 - c. Louis Mellinger;
 - d. Brevin Knight;
 - e. Naiima Fauntleroy;
 - f. Randal Pinkett; and/or
 - g. Charlie Villanueva.
2. All records related to payments made to Louis Mellinger as partial repayment of his investment of \$150,000 with The George Group, LLC and C. Tate George, including
- a. all records of a fax request to the bank on or about December 21, 2007 to wire *?* money to Louis Mellinger (Gov't Ex. 207);
 - b. all records concerning the release of funds from escrow to Louis Mellinger, a wire sent out in and around January 25, 2008 to Louis Mellinger, and/or *NO* communications with the bank in and around January 25, 2008 to wire out funds to Louis Mellinger (Gov't Ex. 208);
 - c. all records of a wire sent out in and around February 20, 2008 to Louis Mellinger *NO* and/or communications with the bank in and around February 20, 2008 to wire out funds to Louis Mellinger (Gov't Ex. 208);
 - d. all records of the receipt of funds for a deal that closed on or about February 29, *NO* 2008 to be sent to Louis Mellinger (Gov't Ex. 212);
 - e. all records related to a \$75,000 certificate of deposit ("CD") and the cashing of *NOT MINE* that CD on or about April 9, 2008 (Gov't Ex. 223); and
 - f. all records related to debt that Jason Matthews owes to The George Group, LLC, *NO* Tate George, or any other entity controlled by C. Tate George (Gov't Ex. 263).

3. All records related to payments made to Brevin Knight as partial repayment of his investment of \$300,000 with The George Group, LLC and C. Tate George, including^{no}
 - a. all records concerning the release of funds from escrow to Brevin Knight, a wire sent out in and around June 12, 2008 to Brevin Knight, and/or communications with the bank in and around June 12, 2008 to wire out funds to Brevin Knight (Gov't Ex. 419);^{no}
 - b. all records related to a life insurance policy and money received from a life insurance policy on or about July 20, 2009, including delivery of any payment to Brevin Knight (Gov't Ex. 423);^{no}
 - c. all records of payment to Brevin Knight on or about August 10, 2009 (Gov't Ex. 424); and^{no}
 - d. all records of payment to Brevin Knight on or about September 9, 2009 (Gov't Ex. 424).^{no}
4. All records related to payments made to Naiima Fauntleroy as partial repayment of her investment of \$46,000 with The George Group, LLC and C. Tate George, including^{no}
 - a. all records concerning the release of funds from escrow to Naiima Fauntleroy in and around April 1, 2008, and/or communications with the bank to wire out funds to Naiima Fauntleroy (Gov't Ex. 4);^{no}
 - b. all records of a wire sent out in and around October 23, 2009 to Naiima Fauntleroy and/or communications with the bank to wire out funds to Naiima Fauntleroy (Gov't Exs. 6 and 7);^{no}
 - c. all records relating to a lawsuit initiated by The George Group, LLC, C. Tate George, or any other entity controlled by C. Tate George against the East Orange Housing Authority in and around March 24, 2011 (Gov't Ex. 8).^{no}
5. All records related to any capitalization of The George Group, LLC, C. Tate George, or any other entity controlled by C. Tate George by Howard Trachtenberg and/or Elaine Trachtenberg;^{yes}
6. All records related to any involvement of The George Group, LLC, C. Tate George or any other entity controlled by C. Tate George in the following real estate developments:^{no}
 - a. Glendale Villas: 21101 Voyage Boulevard, Land O'Lakes, FL 34639;
 - b. Chelsea Meadows: 22620 Gage Loop, #30, Land O'Lakes, FL 34639;
 - c. Venetia Country Club: 200 Country Club Drive, Largo, FL 33771;
 - d. The Laurels at Sherwood: 6065 10th Avenue, North Greenacres, FL 33463;
 - e. Kentwood Park: 2302 Maki Road, Plant City, FL 33563;
 - f. Sienna Park: 3441 Clark Road, Sarasota, FL 34231; and
 - g. Garden Grove, 5719 Granada Drive, Sarasota, FL 34231;

7. All records related to any business relationship between The George Group, LLC, C. Tate George or any other entity controlled by C. Tate George with Juan Puig and/or the Puig Development Group; *no*
8. All records concerning the completion of the development and/or redevelopment of any real estate by The George Group, LLC, C. Tate George or any other entity controlled by C. Tate George, and the value of those real estate development(s) and/or redevelopment(s). *yes*
- H* 9. All records regarding any business relationship between The George Group, LLC, C. Tate George or any other entity controlled by C. Tate George and Charles D. Houlihan, Jr., other than an attorney-client relationship; *no*
10. All records concerning any real estate closing related to The George Group, LLC, C. Tate George or any other entity controlled by C. Tate George that occurred on or about November 14, 2007 (Gov't Ex. 126); *Already given*
11. All records relating to the source of the money deposited into TD Bank account #4283717771 in the name of Claude Tate George (Gov't Ex. 908); and *yes*
12. All records demonstrating the association of C. Tate George with 6022 NW 32nd Court, Boca Raton, FL 33496, following October 20, 2010. *no*

N. Steinert
c/o C. Tate George
2414 28th St BSMNT
Astoria, NY 11102

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